



## **OFFSHORE OPERATORS** **COMMITTEE**

December 15, 2011

Mr. Isaac Chen  
Mail Code- 6WQ  
Environmental Protection Agency  
Fountain Place 12th Floor, Suite 1200  
1445 Ross Avenue  
Dallas, TX 75202-2733

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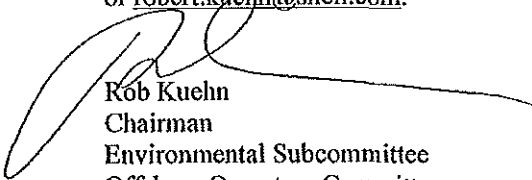
Subject: Offshore Operators Committee  
Comments to Meeting Materials of 17 November, 2011  
GMG 290000

Dear Mr. Chen:

The Offshore Operators Committee (OOC) appreciates the opportunity to submit comments to the U.S. Environmental Protection Agency (EPA) on the materials and information shared with us at the November 17, 2011 meeting. We appreciate the Agency's time and efforts on the permit. Given the short turnaround time, OOC would like the Agency to consider these as initial comments subject to further clarification. Please find attached the following:

- Attachment 1: OOC Comments to EPA Proposals for Past Determinations
- Attachment 2: OOC Comments to EPA Proposals for Permit Revisions/Clarifications
- Attachment 3: OOC Comments from Review of the Draft Permit and Draft Fact Sheets 11/17/11
- Attachment 4: Gulf of Mexico General Offshore Lease, Platform, Operator Scenarios

If there are any questions or if additional information is requested, please contact me at (504) 728-7693 or [robert.kuehn@shell.com](mailto:robert.kuehn@shell.com).



Rob Kuehn  
Chairman  
Environmental Subcommittee  
Offshore Operators Committee

RBK

Attachments

Cc: w/ Attachments via email  
OOC Environmental Subcommittee Members  
Mr. Brent Larsen- EPA Region 6  
S. Erin O'Reilly, Ph.D.- Bureau of Ocean Energy Management, GOM Region